

1 David R. Ongaro (State Bar No. 154698)  
dongaro@ongaropc.com  
2 Glen Turner (State Bar No. 212417)  
gturner@ongaropc.com  
3 ONGARO PC  
50 California Street, Suite 3325  
4 San Francisco, CA 94111  
Telephone: (415) 433-3900  
5 Facsimile: (415) 433-3950

6 Attorneys for Plaintiff  
7 WAYNE RUDEN

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF ARIZONA**  
10

11  
12 IN RE: BARD IVC FILTERS  
PRODUCT LIABILITY LITIGATION,

13  
14 THIS DOCUMENT RELATES TO:

MDL Docket No. 15-02641

15 WAYNE RUDEN,  
16 C. A. No.: CV-16-00344-PHX-DGC

17 WAYNE RUDEN,  
18 Plaintiff,  
19 vs.  
20 C.R. BARD, INC., et al.,  
21 Defendants.  
22

**SUPPLEMENTAL DECLARATION  
OF GLEN TURNER IN SUPPORT OF  
PLAINTIFF WAYNE RUDEN'S  
MOTION FOR SHORT  
CONTINUANCE OF MOTION  
HEARINGS NOTING NON-  
OPPOSITION OF CALIFORNIA  
PACIFIC MEDICAL CENTER**

Complaint Filed: October 7, 2015

1 I, Glen Turner, declare as follows:

2 1. I am an attorney licensed to practice law in California. I am an attorney  
3 with the law firm of Ongaro PC, attorneys of record for plaintiff Wayne Ruden in the  
4 above captioned matter. I am one of the attorneys prosecuting this matter for Mr. Ruden,  
5 and the attorney primarily handling day-to-day activities on the case. The facts set forth  
6 herein are of my own personal knowledge and if called upon to testify, I could and would  
7 do so competently. I submit this supplemental declaration in support of Mr. Ruden's  
8 Motion for Short Continuance of Motion Hearings.

9 2. Today our office received confirmation from counsel for California Pacific  
10 Medical Center, that California Pacific Medical Center does not oppose Mr. Ruden's  
11 request for a short continuance due to counsel's trial conflict.

12 3. Attached hereto as Exhibit A is a true and correct copy of correspondence  
13 from counsel for California Pacific Medical Center indicating non-opposition.

14 I declare under the penalty of perjury under the laws of the State of California that  
15 the foregoing is true and correct, and that this declaration was executed on March 28,  
16 2016, in Monterey, California.



---

Glen Turner

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of March 2016, a copy of the foregoing was served electronically and notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter. Parties may access this filing through the Court's system.

/s/ Glen Turner  
Glen Turner